

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
)	
v.)	CRIMINAL NO. 15-CR-10153-WGY
)	
)	
DAVID WRIGHT,)	
Defendant)	
)	

Defendant David Wright's Request to Call a Witness at Sentencing Hearing

The Defendant requests pursuant to Fed. R. Crim. P. Rule 32(i)(2) that he be permitted to call a single witness at the sentencing hearing, as this witness has information which is relevant to the sentencing factors pursuant to 18 USC §3553 which is not otherwise obtainable. Specifically, the Defendant requests permission to call the Supervising Corrections Officer in the unit at Plymouth County Corrections facility where Mr. Wright has been housed since his arrest. Counsel attempted to obtain a letter from this individual which would: 1) briefly describe the conditions in the unit, and explain the reasons Mr. Wright has been held there; 2) discuss Mr. Wright's absence of a disciplinary record and highly respectful manner in which he comported himself relative to corrections staff at all times over the last two-and-a-half-years. However, counsel spoke with legal counsel from the facility, who said employees are not permitted to write such letters, and suggested that the best and only way to obtain this information would be serving a subpoena on the witness. Counsel does not anticipate more than ten minutes of testimony from this

witness, and advised the Government during the week of December 11, 2017, that they were contemplating calling this witness. Particularly, given the nature of the allegations, and given several of the arguments advanced in the Government's Sentencing Memorandum, this testimony is critical to effectively address the statutory sentencing factors.

The Defendant,
DAVID WRIGHT
By his attorney,

/s/ Jessica Hedges
Jessica D. Hedges (BBO No. 645847)
Michael Tumposky (BBO No. 660618)
Hedges & Tumposky, LLP
50 Congress St., Suite 600
Boston, MA 02109
T) (617) 722-8220